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PROPOSED ATTORNEYS FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re: § **Chapter 11**
§
THE LASALLE GROUP, INC., et al.,¹ § **Case No. 19-31484**
§
Debtors. § **(Joint Administration Requested)**

**NOTICE OF EXPEDITED HEARING ON
OF CERTAIN "FIRST DAY" MATTERS**

PLEASE TAKE NOTICE that an expedited hearing to consider certain “first day” matters has been set for May 6, 2019, at 1:30 p.m. before the Honorable Stacey G.C. Jernigan, United States Bankruptcy Judge for the Northern District of Texas, Dallas Division, Earle Cabell Federal Building, 1100 Commerce St., Dallas, Texas 75242. The following motions are set for consideration:

¹ A list of the Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, is attached hereto as Schedule 1. The Debtors’ mailing address is 545 E. John Carpenter Freeway, Suite 500, Irving, Texas 75062.

- *Debtors' Emergency Motion for Entry of an Order Authorizing Joint Administration of Chapter 11 Cases Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure* ("Joint Admin Motion") [Docket No. 6];
- *Debtors' Emergency Motion Pursuant to Sections 105(a), 345(b), 363(c), and 364(a) of the Bankruptcy Code for Authorization to (I) Continue Use of Existing Cash Management System, (II) Maintain Existing Bank Accounts, and (III) Waive Certain Deposit Guidelines* (the "Cash Management Motion") [Docket No. 9];
- *Debtors' Emergency Motion for an Order Under 11 U.S.C. §§105, 363, and 507 (I) Authorizing Payment of Pre-Petition Employee Obligations and Related Amounts, (II) Confirming Debtors' Right to Pay Withholding and Payroll-Related Taxes and (III) Directing Banks to Honor Pre-Petition Checks for Employee Obligations* (the "Prepetition Wages Motion") [Docket No. 11];
- *Debtors' Emergency Motion for an Interim and Final Order (I) Authorizing the Use of Cash Collateral Pursuant to sections 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(B) and (II) Granting Adequate Protection to the Pre-petition Secured Lenders* (the "Cash Collateral Motion") [Docket No. 8]; and
- *Debtors' Expedited Motion to Establish Notice Procedures* ("Notice Motion") [Docket No.12].

In addition, the undersigned counsel acknowledges that the request for first day hearing failed to include the following motion:

- *Debtors' Application for an Order Appointing Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtors Pursuant to 28 U.S.C § 156(c), Nunc Pro Tunc to the Petition Date* ("DRC Appointment Request") [Docket No. 10].

The DRC Appointment Request it was filed and served and included in Declaration of Karen Nicolaou in Support of First Day Motions [Docket. No. 10] and the Debtors request that it also be heard on May 6, 2019 at 9:30 a.m.

Dated May 3, 2019.

CROWE & DUNLEVY, P.C.

By: /s/ Vickie L. Driver

Vickie L. Driver

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading provided by me to Donlin Recano for service upon the parties listed below via e-mail, facsimile, overnight delivery, and/or courier on this 3rd day of May, 2019. I further certify that Donlin Recano will file a certificate of service with the court verifying service upon the following upon completion.

- (a) The Office of the United States Trustee for the Northern District of Texas
- (c) Counsel to each of the Debtors' pre-petition secured lenders, or if none, the lender itself;
- (d) The 20 largest unsecured creditors for each Debtor regarding which the pleading impacts, unless and until such time as an official committee of unsecured creditors is appointed, if any;
- (e) Counsel to any official committee established in these Chapter 11 Cases pursuant to section 1102 of the Bankruptcy Code, if any;
- (f) The Office of the Attorney General of the State of Texas;
- (g) The United States Attorney's Office for the Northern District of Texas;
- (h) The Internal Revenue Service;
- (i) The Office of Health and Human Services; and
- (j) All parties who have filed a notice of appearance and request for notice or service of all pleadings pursuant to Bankruptcy Rule 2002.

/s/ Vickie L. Driver

Vickie L. Driver

Schedule 1**List of Debtors**

#	Debtor Name	Case No.	EIN
1	The LaSalle Group, Inc.	19-31484	0143
2	West Houston Memory Care, LLC	19-31485	2760
3	Cinco Ranch Memory Care, LLC	19-31486	2716
4	Pearland Memory Care, LLC	19-31488	5311
5	Riverstone Memory Care, LLC	19-31493	5407